

A R K A N S A S Department of Environmental Quality

September 12, 2012

U.S. EPA Region 6 Attn: Mr. Ruben Moya Mail Code: 6SF 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

RE: Groundwater Remediation Summary June 2012, Revised August 2012;

Arkwood, Inc. Superfund Site, Omaha, Arkansas; EPA ID No. ARD084930148; AFIN: 05-00003

Dear Mr. Moya:

The Arkansas Department of Environmental Quality – Hazardous Waste Division & Water Division (ADEQ) have reviewed the **Groundwater Remediation Summary** dated **June 2012** and **revised August 2012**. The ADEQ concurs with the revised summary document which recommends discontinuation of the non-ozonated water injection for six months, continuation of monthly analytical sampling for the next year and continuation of the New Cricket Spring ozone treatment system operation until the ADEQ water quality chronic standard (15.57 ug/L of pentachlorophenol) is met at the spring.

The additional parameters to be measured monthly during the next year, at a point approximately twenty (20) feet downstream of the weir, will include temperature, pH and dissolved oxygen. These parameters will support calculations per Arkansas Reg. No. 2 "Regulation Establishing Water Quality Standards (WQS) for Surface Waters of the State of Arkansas', § 2.508 Toxic Substances' for the periodic update of the water quality standard for pentachlorophenol during each five-year review as required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 United States Code (U.S.C.) §9601 et seq. Arkansas Reg. No. 2 is considered to be an applicable or relevant and appropriate requirement (ARAR) for the Arkwood site. Because ADEQ has statutory authority, our review and approval is integral to the WQS modification process or any determination related to Arkansas Water Quality Standards.

If you have any comments or questions, please contact me at 501-682-0852 or via e-mail moix@adeq.state.ar.us.

Sincerely,

Mark Moix

Engineer, PE Technical Branch

Hazardous Waste Division

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cc: Jean Mescher